

Federal Aviation Administration (FAA)
Airspace Rules & Regulations Team, AJV-P21
C.a. Mr. Brian Konie

Our ref.: OP-O-CMM-211004-037
Date: 10/04/2021

Subject: Time-limited Exemption from 14 CFR 91.227 (c)(1)(i) and (iii) - Automatic Dependent Surveillance Broadcast (ADS-B) Out Equipment Performance Requirements

Reference: Grant of Exemption Number 12555, Regulatory docket No. FAA-2015-0971

Italia Trasporto Aereo S.p.A. (ITA) presents its compliments to the Federal Aviation Administration and has the honor to refer to the following.

The Italian Government has recently incorporated a new company, Italia Trasporto Aereo S.p.A. ("ITA"), which has been allowed by the European Commission to take over the necessary assets from Alitalia Società Aerea Italiana S.p.A. in extraordinary administration ("Alitalia") under certain conditions to preserve the economic discontinuity between the two Companies.

Alitalia will cease operations on next 15th October 2021, when the new operator (ITA) will start its new operations.

In accordance with ITA's business plan, the Company will utilize the former Alitalia A330s to conduct air services to and from the U.S., being such aircrafts compliant with Regulations 91.225 (a), (b), and (d).

With respect to the relief from § 91.227 (c)(1)(i) and (iii) of Title 14, Code of Federal Regulations (14 CFR), Alitalia submitted a formal request for its A330 fleet in July 2017, obtaining an exemption until December 31, 2024 (Exemption No. 12555).

In consideration of the fact the ITA will operate on U.S. with most of former Alitalia A330 aircrafts, which result still not compliant with § 91.227 (c)(1)(i) and (iii) of Title 14, the Company will open a retrofit plan for its A330s to introduce new MMR GLU-2100 with Airbus Modification No. 206007 (Attached) and committed to introduce the required modification within 31st December 2023.

In light of the above, we do not detect any issue against the public as whole, and we kindly request with the present the relief from § 91.227 (c)(1)(i) and (iii) of Title 14, Code of Federal Regulations (14 CFR).

The present exemption would not adversely affect Safety, being ITA personnel fully trained to use prediction tools (ADAPT) during preflight due to the missing SA function on MMR (multi-mode receiver).

We take the opportunity to confirm that ITA will comply with the conditions and limitations expressed in the Exemption cited above.

Italia Trasporto Aereo S.p.A. avails itself of this opportunity to renew to the Federal Aviation Administration the senses of our highest consideration.

Best Regards,

**Compliance Monitoring
& Safety Manager
Piero Innocenti**

